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Attorneys for Defendant M&T Bank Corp.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MUFTI QUARASHI, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

M&T BANK CORP., and
AMERICAN SECURITY INSURANCE
COMPANY,

Defendants.

Civil Action No.

3:17-cv-06675-BRM-DEA

**M&T BANK CORP.'S MOTION TO
DISMISS PLAINTIFF'S
COMPLAINT**

Motion Date: December 4, 2017

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PLEASE TAKE NOTICE THAT, pursuant to Fed. R. Civ. P. 12(b)(6), 9(b) and 8(a), defendant M&T Bank Corp. ("M&T"), by its counsel, Reed Smith LLP, shall move the United States District Court for the District of New Jersey, before the Honorable Brian R. Martinotti, at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey, on December 4, 2017, for an order dismissing, with prejudice, Plaintiff's Complaint for failure to state any claim upon which relief can be granted. M&T also shall move the Court for an order dismissing the nationwide state law class action allegations with respect to Counts I, II, III and VI of Plaintiff's Complaint for lack of subject-matter jurisdiction pursuant to Fed. R. Civ. P. 12(b)(1).

PLEASE TAKE FURTHER NOTICE that defendant M&T shall rely upon the accompanying Brief in Support of M&T's Motion to Dismiss Plaintiff's Complaint, the Declaration of Ronald K. Wilson and the Joint Brief in Support of the Motion to Dismiss for Lack of Subject Matter Jurisdiction.

Date: November 6, 2017

REED SMITH LLP

Attorneys for M&T Bank Corp.

By: *s/Aaron M. Bender*

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CERTIFICATION OF SERVICE

I hereby certify that on this 6th day of November, 2017, I caused a true and correct copy of the foregoing M&T Bank Corp's Motion to Dismiss Plaintiff's Complaint to be filed electronically and that the same is available for viewing through the Court's ECF system.

Date: November 6, 2017

Respectfully submitted,

By: *s/Aaron M. Bender*

Aaron M. Bender